

2008120338

Chammas Cutters Inc.

915 Enclave Lake Dr
Houston, TX 77077
713-530-7303

SP-14796N
Application

DEC 15 2008

Theodore Wilkie
Associate Administrator for Hazardous Materials Safety
Attn: Special Permits, PHH-31
Pipeline and Hazardous Materials Safety Administration
U.S. Department of Transportation
400 7th Street, S.W.
Washington, DC 20590-00001

2008-12-15 10:10

DEPT. OF TRANSPORTATION
DOCKETS

PHMSA-2009-0001

Dear Associate Administrator Wilkie:

Chammas Cutters, Inc. ("Chammas Cutters" or "the Company") manufactures and sells chemical cutting agents for use in oil and gas drilling operations. I am writing to request that the Pipeline and Hazardous Materials Safety Administration ("the Administration") issue a special permit to Chammas Cutters pursuant to regulation 49 C.F.R. §107.105 to allow the Company to transport Bromine Trifluoride in containers that differ from the requirements specified in 49 C.F.R. § 173.228 for non-bulk quantities.

I. Chammas Cutters

Chammas Cutters is a private company that was established on November 5, 2008, in Houston, Texas. I am the Company's technical principal in charge of its operations.

I have approximately twenty-five years of experience and extensive expertise in designing chemical cutters where the bromine trifluoride is utilized. I have been involved with more than 25000 shipments of Bromine Trifluoride worldwide without a single safety incident.

I started my career as a mechanical design engineer at one of the pioneer companies that specializes in chemical cutters and I worked my way up thru the ranks to become the general manager of operation. I have held the top position in the company for the last twelve years.

II. Regulatory Requirements for the Packaging of Bromine Trifluoride

Bromine Trifluoride is a UN pressure receptacle material (UN 1746) and is a hazard class 5.1 oxidizer. See 49 C.F.R. § 172.101. Department of Transportation ("DOT") regulations require that Bromine Trifluoride be packaged either in cylinders conforming to specifications 3A150, 3AA150, 3B240, 3BN150, 4B240, 4BA240, 4BW240, and 3E1800 as specified in part 178 of the regulations; or in UN cylinders as specified in part 178, except acetylene cylinders and non-refillable cylinders with a minimum test pressure of 10 bar and a minimum outage of 8 percent by volume.

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III. Chammas Cutters' Proposed Packaging Method

Chammas Cutters seeks a special permit to allow it to transport Bromine Trifluoride in containers that differ from those specified in the regulations but which are of a type that have been used widely and safely in the oil and gas industry for several years. Enclosed as Appendix A are drawings illustrating the characteristics of the proposed cylinders. Specifically, Chammas Cutters seeks to package Bromine Trifluoride in steel cylinders that meet the following specifications:

- The cylinders will be sealed with internal parts (jam nut, seal disc, seal seat) to ensure maximum safety and reliability. The three internal components on each end of the cylinder (jam nut, seal disc, seal seat) are assembled under a specific torque to insure the Bromine Trifluoride is well contained within the cylinder. The cylinders are also equipped on each end with transport plugs (O-ring seals) that must remain on the cylinder at all times until the end user is ready to use the cylinder at the well site. The transport plug serves the purpose of protecting the internal seals from damage during transportation.
- The material of the cylinder will be cold drawn seamless SAE 4130, 4135 or 4140.
- The charge pressure of the cylinder will not exceed 700 psi at 130 degree F. The ratio of design burst pressure to charge pressure at 130 degree F will be greater than 40:1.
- The cylinder will be integrated into a tool of multiple pieces to form a chemical cutter.

The chemical cutter for which the Bromine Trifluoride will be used is a device that is used to cut and retrieve stuck tubing down hole in oil and gas wells. It is lowered down on an electrical cable to the desired depth to sever the pipe. See Attachment A for a sketch of a typical cutter assembly.

Chammas Cutters believes that its proposed method of packaging the Bromine Trifluoride is safe and will uphold the regulations' intent that the chemical be transported without posing a hazard to human health or the environment.

IV. Transportation of the Cylinders

Chammas Cutters would transport the cylinders filled with Bromine Trifluoride in strong/pre-tested wooden crates with a maximum capacity of six cylinders per box. The wooden crates would be constructed from 1 1/2" thick yellow pine wood free from any defects. Attached as Appendix B is a drawing of the wooden crate. Chammas Cutters intends to ship the cylinders domestically and internationally via motor vehicle, rail freight, cargo vessel, and cargo aircraft as necessary.

V. Steel Cylinders Conforming to the Specifications Proposed by Chammas Cutters Are Already Used Widely in the Oil and Gas Industry

Bromine Trifluoride is available from several different sources within the United States and is widely used in the oil and gas industry. To our knowledge, Bromine Trifluoride is used exclusively to cut stuck tubing down hole for the oil and gas industry.

The Administration has already issued special permits to allow other companies in the oil and gas industry to use steel containers meeting Chammas Cutters' proposed specifications. To our knowledge, several U.S. companies in the oil and gas industry have packaged Bromine Trifluoride in virtually identical containers and shipped them in interstate commerce safely and without incident. Some of the companies shipping Bromine Trifluoride in this fashion by special permit from the Administration include:

- Baker Atlas (DOT-SP8971)
- Diamondback Industries (DOT-SP 8843)
- Halliburton (DOT-E 7879)
- Pipe Recovery Systems, Inc. (DOT-SP 7774)

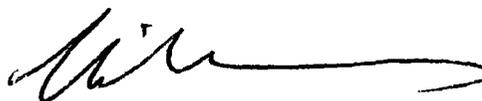
VI. Conclusion

For these reasons, Chammas Cutters believes that this special permit request is reasonable and satisfies the Administration's requirements that Bromine Trifluoride be transported safely. We respectfully request that the Administration provide Chammas Cutters with the special permit as expeditiously as possible.

Please do not hesitate to contact us should you have technical or other questions regarding this special permit application. The contact for this matter is:

Michel E. Chammas
General manager
Chammas Cutters Inc.
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(713) 530-7303
Michel@mi4.com

Very truly yours,

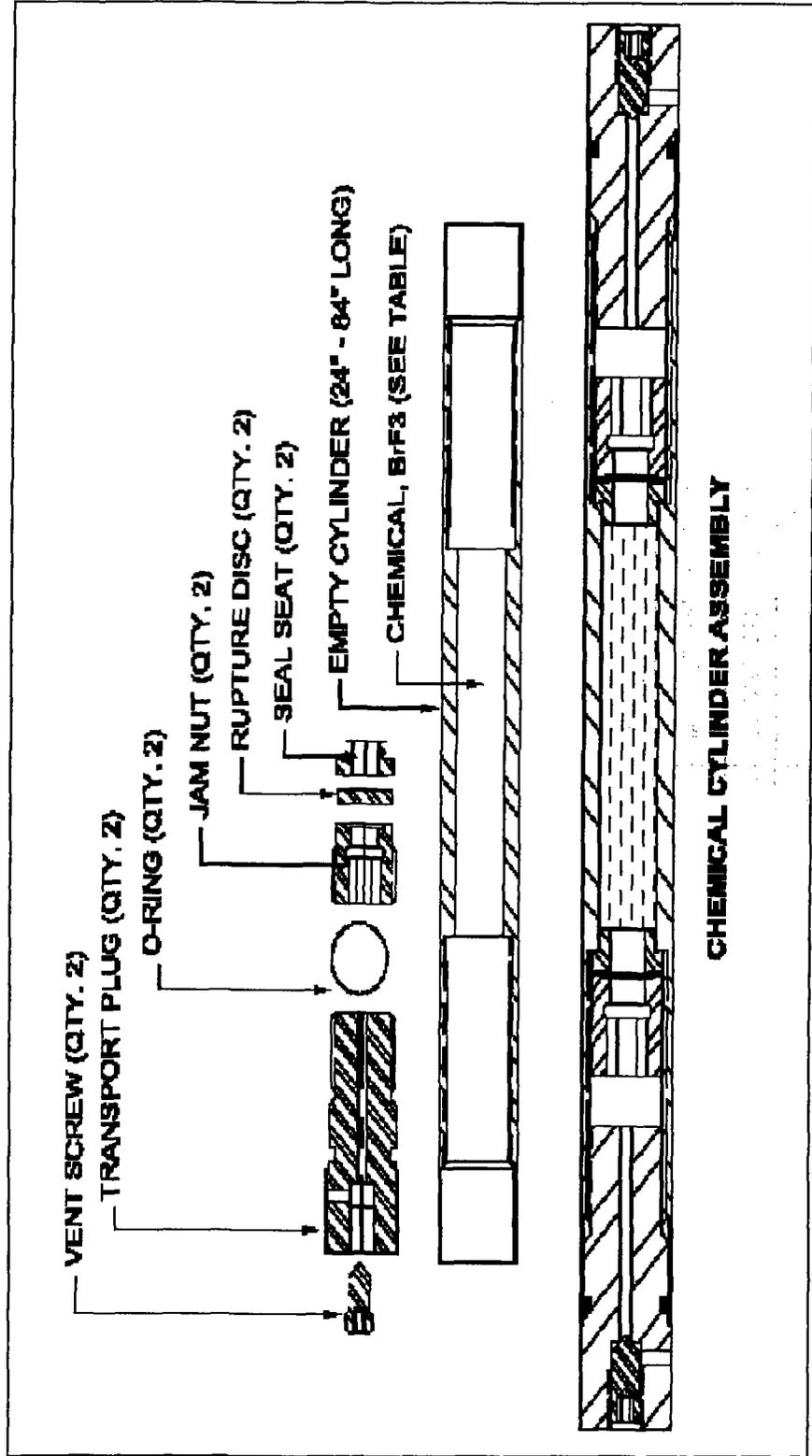


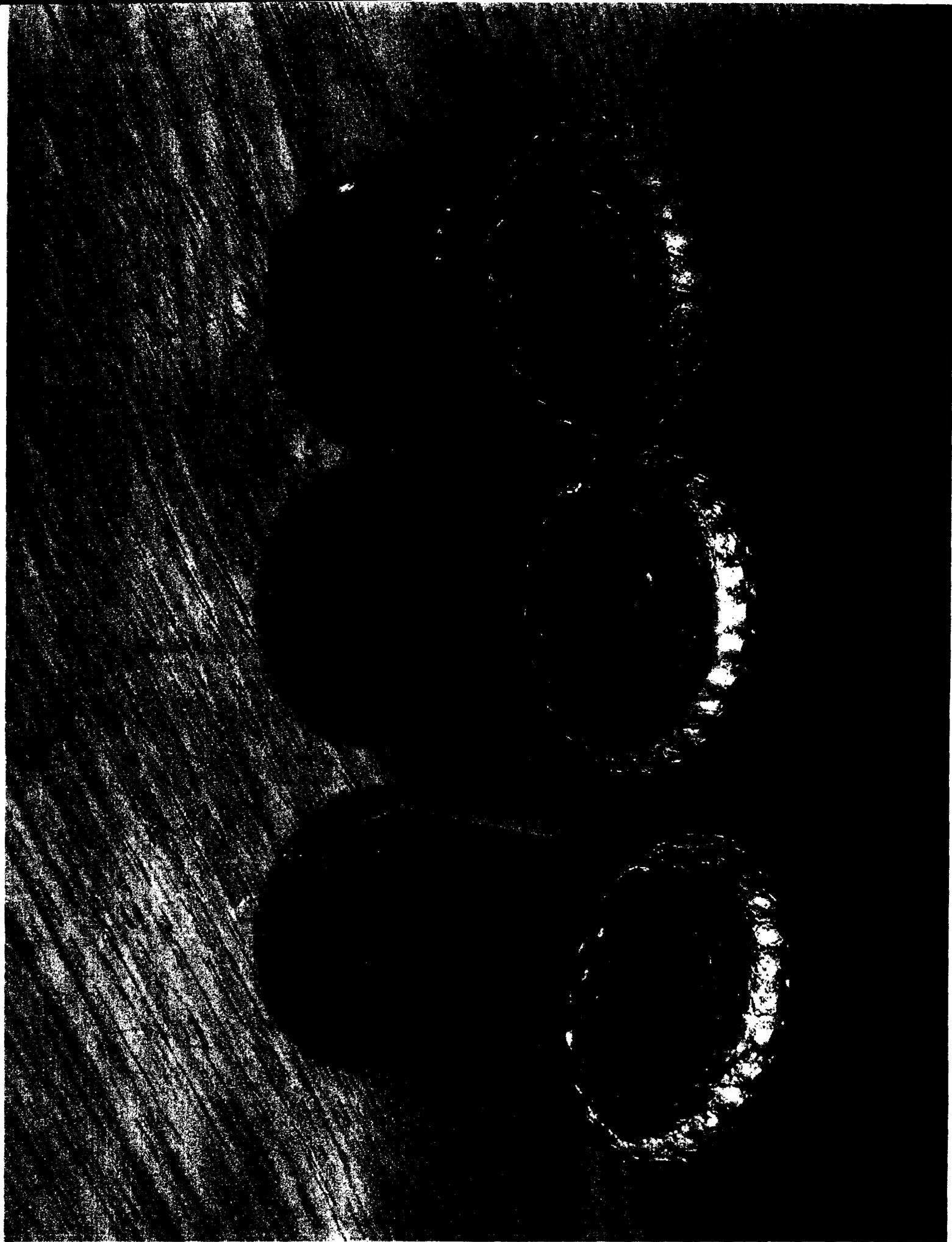
Enclosures: Appendices A-B

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SIZE	ASSEMBLY P/N	TRANSPORT PLUG	O-RING SEAL	VENT SCREW	JAM NUT	SEAL SEAT	RUPTURE DISC	EMPTY CYLINDER	CHEMICAL BIF3	CHEMICAL VOLUME
1 3/8 X 48	CCI-222500-48	CCI-222501	CCI-240440-120	CCI-227502	CCI-222503	CCI-222504	CCI-222505	CCI-222506-48	CCI-222507-225	225 CC
1 3/8 X 60	CCI-222500-60	CCI-222501	CCI-240440-120	CCI-227502	CCI-222503	CCI-222504	CCI-222505	CCI-222506-60	CCI-222507-290	290 CC
1 3/8 X 72	CCI-222500-72	CCI-222501	CCI-240440-120	CCI-227502	CCI-222503	CCI-222504	CCI-222505	CCI-222506-72	CCI-222507-354	354 CC
1 3/8 X 80	CCI-222500-80	CCI-222501	CCI-240440-120	CCI-227502	CCI-222503	CCI-222504	CCI-222505	CCI-222506-80	CCI-222507-450	450 CC
1 3/8 X 84	CCI-222500-84	CCI-222501	CCI-240440-120	CCI-227502	CCI-222503	CCI-222504	CCI-222505	CCI-222506-84	CCI-222507-515	515 CC

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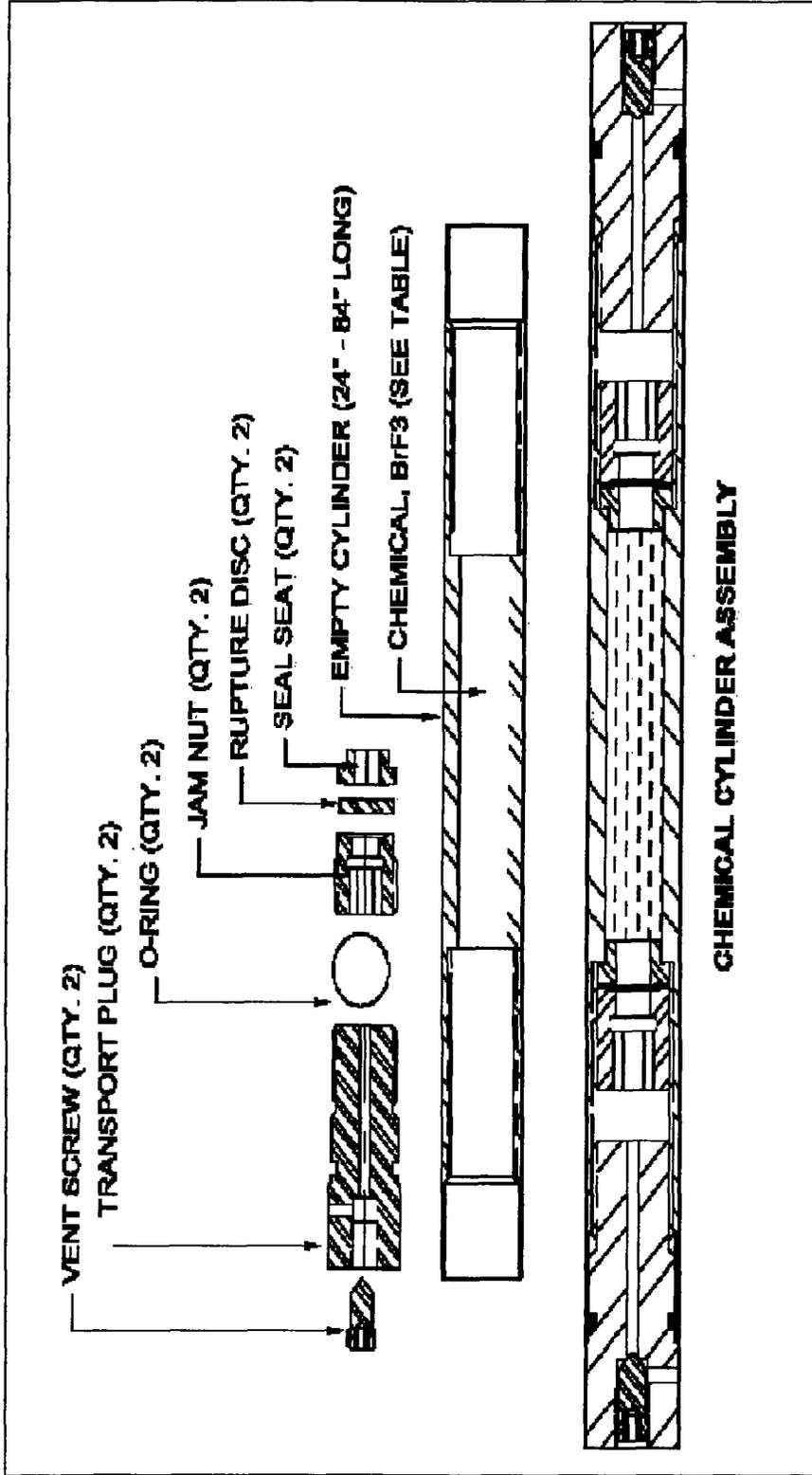




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SIZE	ASSEMBLY P/N	TRANSPORT PLUG	O-RING SEAL	VENT SCREW	JAM NUT	SEAL SEAT	RUPTURE DISC	EMPTY CYLINDER	CHEMICAL BIF3	CHEMICAL VOLUME
1 X 48	CCI-216500-48	CCI-216501	CCI-240440-116	CCI-227502	CCI-216503	CCI-216504	CCI-216505	CCI-216506-48	CCI-216507-155	155 CC
1 X 72	CCI-216500-72	CCI-216501	CCI-240440-116	CCI-227502	CCI-216503	CCI-216504	CCI-216505	CCI-216506-72	CCI-216507-247	247 CC

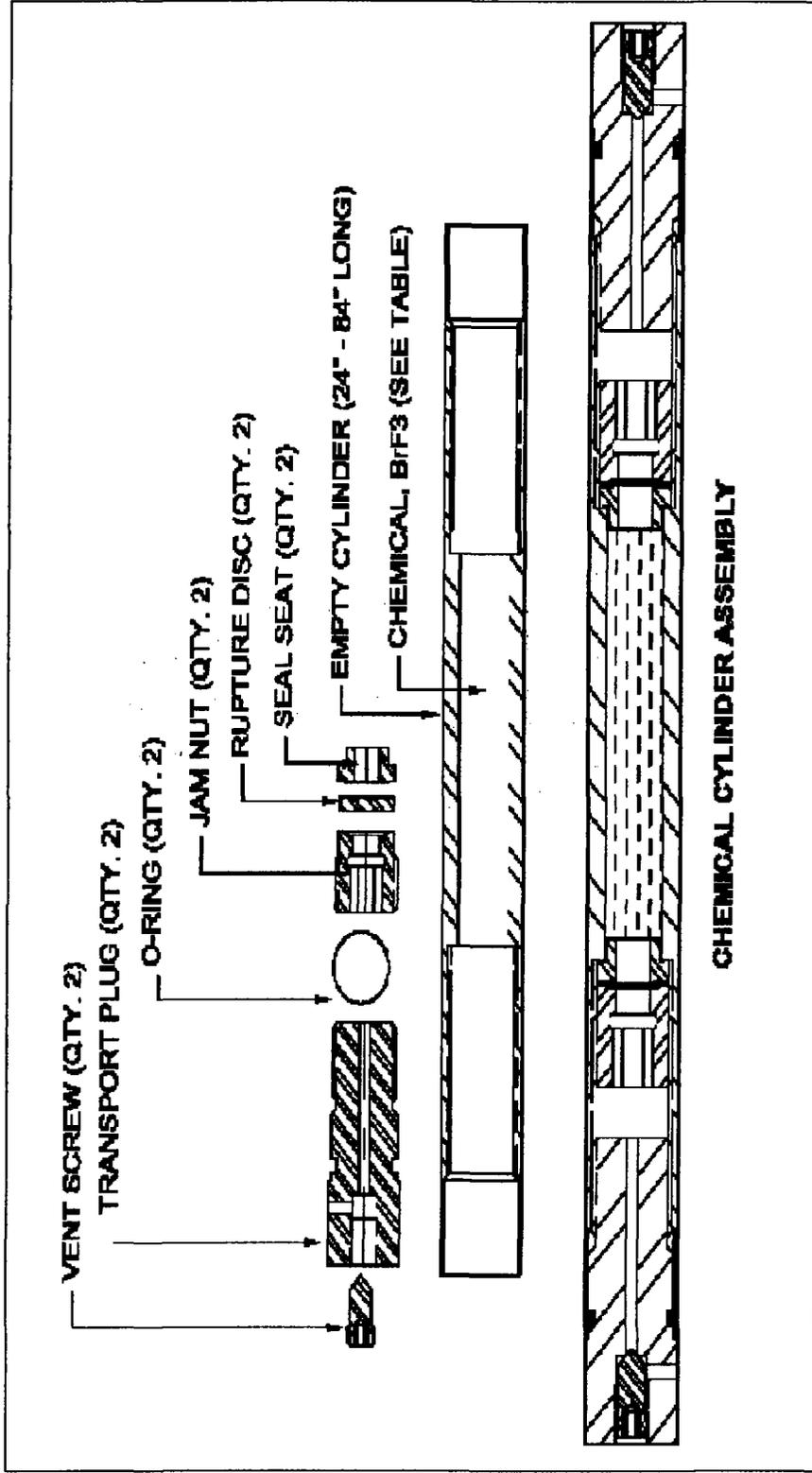
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SIZE	ASSEMBLY P/N	TRANSPORT PLUG	O-RING SEAL	VENT SCREW	JAM NUT	SEAL SEAT	RUPTURE DISC	EMPTY CYLINDER	CHEMICAL BfF3	CHEMICAL VOLUME
3/4 X 48	CCI-212500-48	CCI-212501	CCI-240440-015	CCI-227502	CCI-212503	CCI-212504	CCI-212505	CCI-212506-48	CCI-212507-079	79 CC
3/4 X 72	CCI-212500-72	CCI-212501	CCI-240440-015	CCI-227502	CCI-212503	CCI-212504	CCI-212505	CCI-212506-72	CCI-212507-124	124 CC

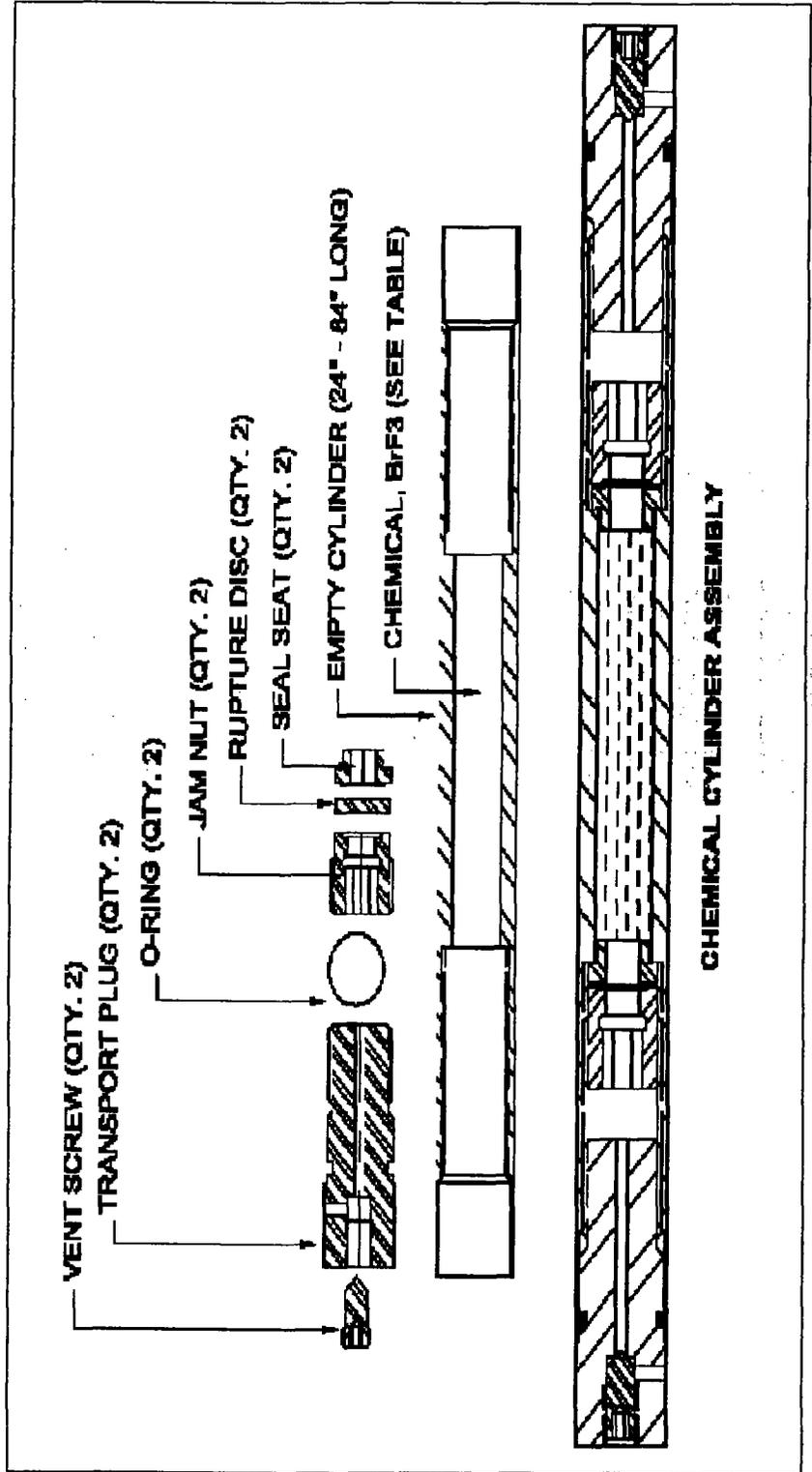
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SIZE	ASSEMBLY P/N	TRANSPORT PLUG	O-RING SEAL	VENT SCREW	JAM NUT	SEAL SEAT	RUPTURE DISC	EMPTY CYLINDER	CHEMICAL BrF3	CHEMICAL VOLUME
1 11/16 X 24	CCI-227500-24	CCI-227501	CCI-240440-216	CCI-227502	CCI-227503	CCI-227504	CCI-227505	CCI-227506-24	CCI-227507-161	161 CC
1 11/16 X 36	CCI-227500-36	CCI-227501	CCI-240440-216	CCI-227502	CCI-227503	CCI-227504	CCI-227505	CCI-227506-36	CCI-227507-277	277 CC
1 11/16 X 48	CCI-227500-48	CCI-227501	CCI-240440-216	CCI-227502	CCI-227503	CCI-227504	CCI-227505	CCI-227506-48	CCI-227507-392	392 CC
1 11/16 X 60	CCI-227500-60	CCI-227501	CCI-240440-216	CCI-227502	CCI-227503	CCI-227504	CCI-227505	CCI-227506-60	CCI-227507-506	506 CC
1 11/16 X 72	CCI-227500-72	CCI-227501	CCI-240440-216	CCI-227502	CCI-227503	CCI-227504	CCI-227505	CCI-227506-72	CCI-227507-621	621 CC
1 11/16 X 80	CCI-227500-80	CCI-227501	CCI-240440-216	CCI-227502	CCI-227503	CCI-227504	CCI-227505	CCI-227506-80	CCI-227507-784	784 CC
1 11/16 X 84	CCI-227500-84	CCI-227501	CCI-240440-216	CCI-227502	CCI-227503	CCI-227504	CCI-227505	CCI-227506-84	CCI-227507-898	898 CC

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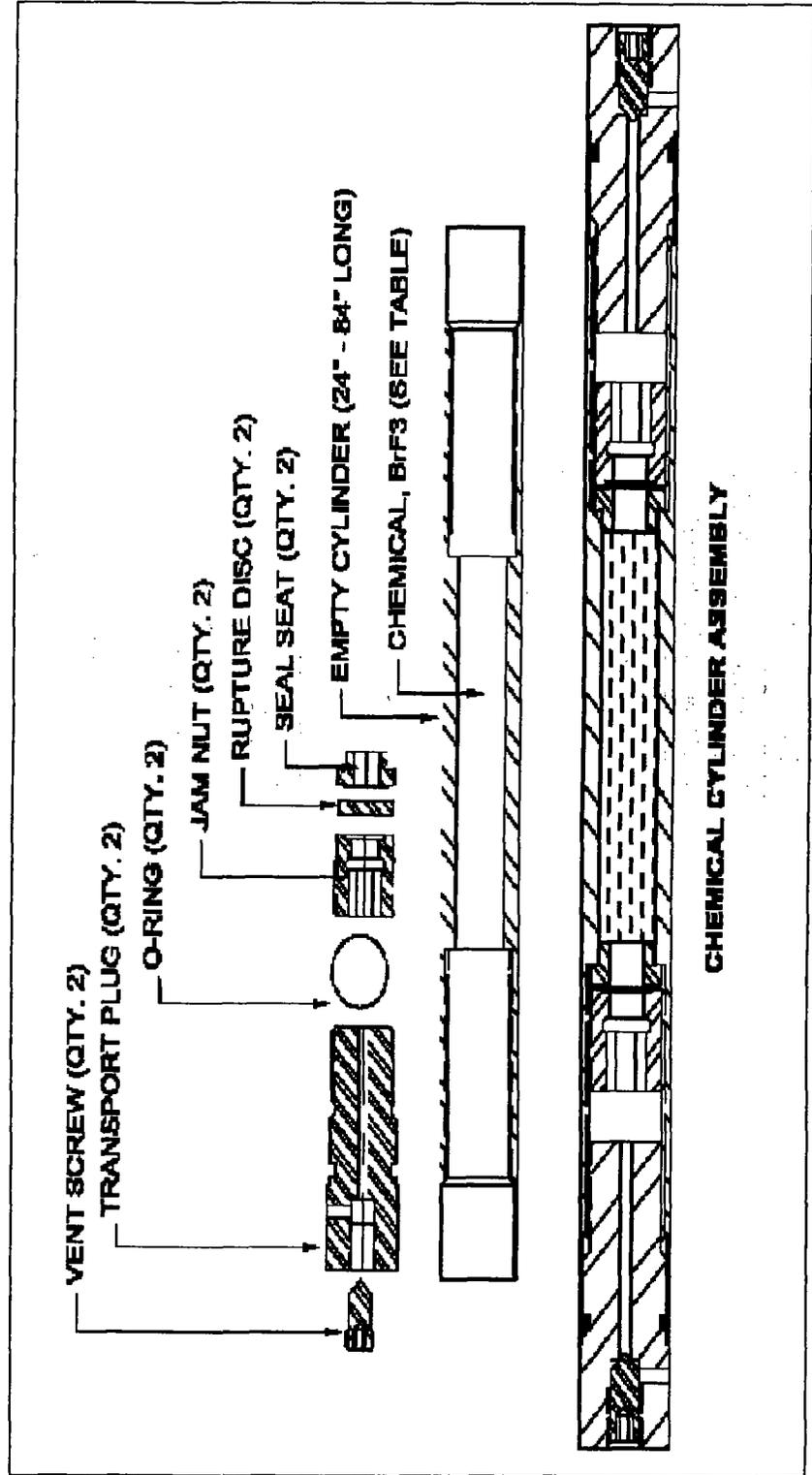


CHEMICAL CYLINDER ASSEMBLY

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SIZE	ASSEMBLY P/N	TRANSPORT PLUG	O-RING SEAL	VENT SCREW	JAM NUT	SEAL SEAT	RUPTURE DISC	EMPTY CYLINDER	CHEMICAL BrF3	CHEMICAL VOLUME
2 X 24	CCI-240500-24	CCI-240501	CCI-240440-220	CCI-227502	CCI-240503	CCI-240504	CCI-240505	CCI-240506-24	CCI-240507-248	248 CC
2 X 36	CCI-240500-36	CCI-240501	CCI-240440-220	CCI-227502	CCI-240503	CCI-240504	CCI-240505	CCI-240506-36	CCI-240507-428	428 CC
2 X 48	CCI-240500-48	CCI-240501	CCI-240440-220	CCI-227502	CCI-240503	CCI-240504	CCI-240505	CCI-240506-48	CCI-240507-608	608 CC
2 X 60	CCI-240500-60	CCI-240501	CCI-240440-220	CCI-227502	CCI-240503	CCI-240504	CCI-240505	CCI-240506-60	CCI-240507-790	790 CC
2 X 72	CCI-240500-72	CCI-240501	CCI-240440-220	CCI-227502	CCI-240503	CCI-240504	CCI-240505	CCI-240506-72	CCI-240507-970	970 CC
2 X 80	CCI-240500-80	CCI-240501	CCI-240440-220	CCI-227502	CCI-240503	CCI-240504	CCI-240505	CCI-240506-80	CCI-240507-1216	1216 CC
2 X 84	CCI-240500-84	CCI-240501	CCI-240440-220	CCI-227502	CCI-240503	CCI-240504	CCI-240505	CCI-240506-84	CCI-240507-1398	1398 CC

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SIZE	ASSEMBLY P/N	TRANSPORT PLUG	O-RING SEAL	VENT SCREW	JAM NUT	SEAL SEAT	RUPTURE DISC	EMPTY CYLINDER	CHEMICAL BrF3	CHEMICAL VOLUME
11/16 X 72	CCI-211500-72	CCI-211501	CCI-240440-014	CCI-227502	CCI-211503	CCI-211504	CCI-211505	CCI-211506-72	CCI-211507-090	90 CC

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